

**Agreed Constructions**

<b>Term</b>	<b>Agreed Construction</b>
<b>“web service”</b> '122 Claims 1, 2, 5, 6, 15, 16 '901 Claims 1, 11, 16, 17 '088 Claims 1, 15, 19, 20	“one or more software components, hardware components, or any combination thereof, associated with providing, receiving, and/or interfacing with data over a network”
<b>“browser toolbar”</b> '122 Claims 1-3, 6, 7, 15, 16 '901 Claims 1, 8, 9, 11, 16, 18, 19 '088 Claims 1, 5, 6, 15, 20	“a software program that adds functionality to a browser and includes a graphical user interface component within the browser”

**Disputed Constructions<sup>1</sup>**

<b>Term</b>	<b>LPV Construction</b>	<b>LPV Intrinsic Evidence<sup>2</sup></b>	<b>Zoho Construction</b>	<b>Zoho Intrinsic Evidence</b>
<b>“account information”</b> ’122 Claims 1, 3, 6, 15 ’901 Claims 1, 4, 8, 9, 11, 14, 16, 18, 19 ’088 Claims 1, 5, 15, 20	Plain and ordinary meaning – no need for construction.	’122 Patent Abstract; Figs. 1-3; 1:15-2:9; 2:18-57; 2:64-3:7; 3:21-4:35; 4:44-63; 5:6-7:43; 10:15-12:33  ’122 Patent History: Nov. 16, 2010 Office Action Response at 8-9; March 2, 2015 Office Action Response at 12.  ’088 Patent History: July 26 Office Action Response at 7-10.	“Information from an account (e.g. an account number) wherein the account is associated with an open account or closed account system”  “An open account system is one that enables transactions with different merchants. Credit cards such as Visa and American Express are examples of open accounts. Closed accounts, by contrast, may be restricted to use with a particular store/merchant, a particular chain of stores/merchants or a collection of affiliated stores/merchants.”	’122 Patent at 1:15-19; 1:23-32; 1:33-43; 1:57-2:9; 2:13-52; 3:17-24; 3:25-29; 3:37-55; 4:1-6; 4:25-30; 5:6-22; 5:23-61; 6:7-27 6:28-64; 7:1-6; 7:13-34; 7:25-43; Figs. 1-3.  Ex. A (Dkt. 30-3, ’122 Application) at 18-23; Ex. C (Dkt. 30-5, November 16, 2010 Office Action Response) at 9; Ex. E (Dkt. 30-7, March 21, 2011 Office Action Response) at 10; Ex. F (Dkt. 30-7, April 30, 2014 Notice of Allowance) at 9; Ex. I (30-11, March 2, 2015 Office Action Response) at 2-10.

<sup>1</sup> Unless otherwise specified, all citations are to the shared specification of the ’122 Patent.

<sup>2</sup> The parties reserve the right to amend the identified intrinsic evidence after considering arguments raised in the Opening Briefs.

## Exhibit A – Joint Claim Construction Statement

Civil Action No. 1:22-cv-37-LY

Term	LPV Construction	LPV Intrinsic Evidence <sup>2</sup>	Zoho Construction	Zoho Intrinsic Evidence
<b>“encryption key”</b> ’122 Claims 1, 7, 15	Plain and ordinary meaning – no need for construction.	’122 Patent Abstract; Figs. 2-4; 1:51-65; 2:17-53; 4:53-68; 5:45-68; 7:44-8:1110:15-12:33  ’122 Patent History: Nov. 16, 2010 Office Action Response at 8-9; March 2, 2015 Office Action Response at 12.  ’088 Patent History: July 26 Office Action Response at 7-10.	“a private key that corresponds to a public key”	’122 Patent at Abstract; 1:51-68; 2:21-25; 2:46-48; 4:57-67; 5:45-52; 5:53-59; 5:62-64; 6:62-67; 8:7-9.  Ex. F (Dkt. 30-7, April 30, 2014 Notice of Allowance) at 5-7; Ex. H (Dkt. 30-10, November 11, 2014 Office Action Response) at 2-7; Ex. I (Dkt. 30-11, March 2, 2015 Office Action Response) at 2-10.
<b>“cryptographic key”</b> ’901 Claims 1, 4, 11, 14 ’088 Claims 1, 15	Plain and ordinary meaning – no need for construction.	Same as “encryption key”	“a private key that corresponds to a public key”	
<b>“securely storing the account information at the browser toolbar”</b> ’122 Claim 1	Plain and ordinary meaning – no need for construction, or in the alternative: “storing the account information in a data storage implementation wherein the stored account information is securely accessible by the browser toolbar”	’122 Patent Abstract; Figs. 1-5; 2:14-53; 2:64-3:24; 4:12-24; 4:53-62; 5:45-6:15; 7:1-6; 8:41-9:20; 10:15-12:33  ’122 Patent History: Nov. 16, 2010 Office Action Response at 8-9; March 2, 2015 Office Action Response at 12.	Indefinite, or in the alternative: “storing the account information in a data storage implementation wherein the stored account information is accessible only by the browser toolbar”	’122 Patent at 1:23-25; 1:51-54; 1:59-65; 2:5-9; 3:17-24; 3:62-67; 4:14-16; 5:53-61; 6:1-3; 6:11-16; 6:19-20; 6:58-64; 6:67-7:2; Figs. 1-2.  Ex. E (Dkt. 30-7, March 21, 2011 Office Action Response) at 8, 9; Ex. F (Dkt. 30-7, April

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Term	LPV Construction	LPV Intrinsic Evidence <sup>2</sup>	Zoho Construction	Zoho Intrinsic Evidence
		'088 Patent History: July 26 Office Action Response at 7-10.		30, 2014 Notice of Allowance) at 8, 9; Ex. H (Dkt. 30-10, November 11, 2014 Office Action Response) at 2-7;
<b>“securely storing, by the browser toolbar, the account information at the browser toolbar”</b> '901 Claims 1, 11 '088 Claim 1	Plain and ordinary meaning – no need for construction, or in the alternative: “storing, by the browser toolbar, the account information in a data storage implementation wherein the stored account information is securely accessible by the browser toolbar”	'122 Patent Abstract; Figs. 1-5; 2:14-53; 2:64-3:24; 4:12-24; 4:53-62; 5:45-6:15; 7:1-6; 8:41-9:20; 10:15-12:33  '122 Patent History: Nov. 16, 2010 Office Action Response at 8-9; March 2, 2015 Office Action Response at 12.  '088 Patent History: July 26 Office Action Response at 7-10.	Indefinite, or in the alternative: “storing, by the browser toolbar, the account information in a data storage implementation wherein the stored account information is accessible only by the browser toolbar”	Ex. I (Dkt. 30-11, March 2, 2015 Office Action Response) at 2-10, 12.
<b>“generating, via the browser toolbar”</b> '122 Claim 7	Plain and ordinary meaning – no need for construction.	'122 Patent Abstract; Figs. 1-5; 2:14-53; 4:11-63; 5:1-6:64; 7:7-8:11; 9:53-12:33  '122 Patent History: Nov. 16, 2010 Office Action Response at 8-9; March 2, 2015 Office Action Response at 12.	Indefinite	

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Term	LPV Construction	LPV Intrinsic Evidence <sup>2</sup>	Zoho Construction	Zoho Intrinsic Evidence
		'088 Patent History: July 26 Office Action Response at 7-10.		
<b>“generating, at a browser toolbar”</b> '901 Claims 1, 11 '088 Claim 1	Plain and ordinary meaning – no need for construction.	'122 Patent Abstract; Figs. 1-5; 2:14-53; 4:11-63; 5:1-6:64; 7:7-8:11; 9:53-12:33  '122 Patent History: Nov. 16, 2010 Office Action Response at 8-9; March 2, 2015 Office Action Response at 12.  '088 Patent History: July 26 Office Action Response at 7-10.	Indefinite	
<b>“determining, at a browser toolbar”</b> '122 Claim 15 '088 Claim 15	Plain and ordinary meaning – no need for construction.	'122 Patent Abstract; Figs. 1-5; 2:14-53; 4:11-63; 5:1-6:64; 7:7-8:11; 9:53-12:33  '122 Patent History: Nov. 16, 2010 Office Action Response at 8-9; March 2, 2015 Office Action Response at 12.	Indefinite	

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Term	LPV Construction	LPV Intrinsic Evidence <sup>2</sup>	Zoho Construction	Zoho Intrinsic Evidence
		'088 Patent History: July 26 Office Action Response at 7-10.		
<b>“decrypting, at the browser toolbar”</b> '122 Claim 15	Plain and ordinary meaning – no need for construction.	'122 Patent Abstract; Figs. 1-5; 2:14-53; 4:11-63; 5:1-6:64; 7:7-8:11; 9:53-12:33  '122 Patent History: Nov. 16, 2010 Office Action Response at 8-9; March 2, 2015 Office Action Response at 12.  '088 Patent History: July 26 Office Action Response at 7-10.	Indefinite	
<b>“providing, via the browser toolbar, the stored account information to the web service”</b> '122 Claim 6	Plain and ordinary meaning – no need for construction.	'122 Patent Abstract; Figs. 1-5; 2:14-53; 4:11-63; 5:1-6:64; 7:7-8:11; 9:53-12:33  '122 Patent History: Nov. 16, 2010 Office Action Response at 8-9; March 2, 2015 Office Action Response at 12.	Indefinite	

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